
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NORMA LIDIA ANDRADE RAMIREZ, §
ENRIQUE RAMIREZ, INDIVIDUALLY §
AND AS REPRESENTATIVE OF THE §
ESTATE OF AUGUSTIN RAMIREZ, §
DECEASED, MARIA CLEOFAS PATLAN §
HERNANDEZ, ANTONIA RAMIREZ, §
PATLAN, MARIA DEL ROSARIO §
RAMIREZ, AND MARIBEL RAMIREZ PATLAN §

PLAINTIFFS, §

VS. §

SIMONDS INTERNATIONAL §
CORPORATION, §

DEFENDANTS. §

CIVIL ACTION NO. 2:14-CV-1096

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

COME NOW, Plaintiffs Norma Lidia Andrade Ramirez, Enrique Ramirez, Individually and as Representative of the Estate of Agustin Ramirez, Deceased, Maria Cleofas Patlan Hernandez, Antonia Ramirez Patlan, Maria Del Rosario Ramirez and Maribel Ramirez Patlan, and Defendant Simonds International Corporation and file this joint stipulation of dismissal under Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

I.

1.1 Plaintiffs seeking dismissal are Norma Lidia Andrade Ramirez, Enrique Ramirez, Individually and as Representative of the Estate of Agustin Ramirez, Deceased, Maria Cleofas

OF COUNSEL:

Roger S. Braugh, Jr.
State Bar No. 00796244
Federal I.D. No. 21326
Jeffrey H. Richter
State Bar No. 24061614
Federal I.D. No. 1794395
SICO, WHITE, HOELSCHER, HARRIS
& BRAUGH, L.L.P.
802 N. Carancahua, Suite 900
Corpus Christi, Texas 78401
Telephone: 361-653-3300
Facsimile: 361-653-3333

Joel Brent Goudarzi
State Bar No. 00798218
GOUDARZI & YOUNG, LLP
301 North Titus Street
Gilmer, TX 75644
Telephone: 903-843-2544
Facsimile: 903-843-2026

ATTORNEYS FOR PLAINTIFFS

By: /s/ Brett L. Myers
Brett L. Myers
State Bar No. 00788101
FOX ROTHSCHILD
5420 LBJ Freeway, Suite 1200
Dallas, Texas 75240
Telephone: 972-991-0889
Facsimile: 972-404-0516

ATTORNEY-IN-CHARGE FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 30th day of December 2015, a true and correct copy of the above and foregoing document was served upon the following counsel of record via the Court's electronic filing system in accordance with the Federal Rules of Civil Procedure.

/s/ Craig M. Sico
Craig M. Sico

Brett L. Myers
Fox Rothschild
Two Lincoln Centre
5420 LBJ Freeway, Suite 1200
Dallas, TX 75240